

LAW
LERNER • ARNOLD • WINSTON

June 9, 2025

Via ECF and Electronic Mail (CastelNYSDCChambers@nysd.uscourts.gov)

Honorable P. Kevin Castel, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, NY 10007-1312

*Application
GRANTED.
SO ORDERED.
[Signature]
USDJ
6-10-25*

Re: *The Alexander Condominium v. Admiral Indemnity Company*
Civil Action No.: 1:25-cv-01507-PKC
Our File No.: 21-194-AP

Dear Judge Castel:

This firm represents Plaintiff, The Alexander Condominium (hereinafter referred to as "Plaintiff") in the above-captioned matter. We write this joint letter with counsel for Defendant Admiral Indemnity Company regarding this Court's Order dated May 12, 2025 which directed the filing of an application to reopen or or stipulation of dismissal within thirty (30) days from the date of the Order or by June 11, 2025. *See* ECF Doc. No. 21.

As of today's date, the parties are still working on terms of the settlement agreement. However, the parties' obligations under the settlement agreement will take longer than the initial thirty (30) days to effectuate. Thereafter, Defendant is to tender payment to Plaintiff of the amount agreed upon by the parties within thirty (30) days. As such, the parties will not be able to perform their obligations within the allotted thirty (30) day period pursuant to the Order.

Accordingly, the parties are requesting an additional thirty (30) days for Plaintiff to file a stipulation of dismissal, should either party default on its obligations pursuant to the terms of the settlement. / *OK*

We thank you for Your Honor's attention to this matter. If Your Honor requires any additional information, please advise.

Respectfully Submitted,

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